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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

AUG - 7 1997

In the Matters of

SIDNEY TELEPHONE COMPANY

Notification of Inability to Comply  
With August 8, 1997 IntraLATA Toll  
Dialing Parity Implementation Deadline

Implementation of the Local Competition  
Provisions of the Telecommunications Act  
of 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

File No. \_\_\_\_\_

CC Docket No. 96-98

TO: Chief, Common Carrier Bureau

**NOTIFICATION**

Sidney Telephone Company (Sidney) hereby notifies the Commission that it is unable to comply with the August 8, 1997 deadline for implementation of intraLATA toll dialing parity throughout the State of Maine. At this time, Sidney believes that it will be able to implement intraLATA toll dialing parity in Maine during calendar year 1998.

**Preliminary Matter**

Sidney apologizes for its inadvertent failure to submit this Notification by the May 8, 1997 date specified in Section 51.211(c) of the Commission's Rules. The intraLATA toll dialing parity requirement and May 8, 1997 implementation deadline were included in the massive First Report And Order (Implementation of the Local Competition Provisions of the Telecommunications Act of 1996), CC Docket No. 98-98, FCC 96-325 and Second Report And Order And Memorandum Opinion And Order (Implementation of the Local

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Competition Provisions of the Telecommunications Act of 1996), CC Docket No. 98-98, FCC 96-333, which were adopted and released on August 8, 1996. The Commission's intraLATA dialing parity requirement and deadline do not appear to have received significant industry publicity at the time (at least, publicity that came to Sidney's attention), and Sidney consequently focused upon pending Maine proceedings relating to intrastate dialing parity without realizing that the Commission had set intraLATA toll parity deadlines. When it became aware of the Section 51.211 requirement and deadline, Sidney assessed its situation and prepared this notification. It asks the Bureau to accept the document, and to consider the circumstances and alternative implementation schedule set forth herein.

### **Background**

Sidney is a local exchange carrier serving one exchange in rural Maine (approximately 1300 access lines). Sidney acquired these exchanges from Maine Telecommunications Group, Inc. (MTG) and China Telephone Company (China) as part of the continuation of a transaction in which MTG and China had acquired these and other exchanges from Contel of Maine in January 1996. See Maine Telecommunications Group, Inc. et al., 9 F.C.C.R. 3032, (1994).

Contel of Maine had previously converted the exchange to equal access on an interstate basis. Sidney's local exchange customers are presently able to presubscribe to "1+" interstate toll service.

In the first quarter of 1997, ST Long Distance, Inc. dba Northland Long Distance (STLD), an affiliate of Sidney, began providing interstate long distance toll service(s) within the State of Maine.

**Sidney Cannot Meet  
The Commission's August 8, 1997 Deadline**

In order to provide full 2-PIC<sup>1</sup> presubscription in its Maine exchange, Sidney needs to obtain and install hardware upgrades and multiple software packages including Release 20 software in certain end offices. This new hardware/software will cost over \$6,000.00 as a portion of a larger acquisition, and will take over 4 months to order, obtain, install, test and make ready for commercial operation. Hence, if Sidney were required to start the process today, it would not be able to convert to full 2-PIC operation until December 1997 at the very earliest.

In addition, Sidney is also regulated by the Maine Public Utilities Commission (PUC), which has not yet issued rules governing Sidney's implementation and scheduling of intraLATA toll dialing parity. Sidney does not want itself and its local exchange customers to get caught in the middle of potentially different or conflicting federal and state requirements, and believes that all parties will be best served by a one-time conversion that fully

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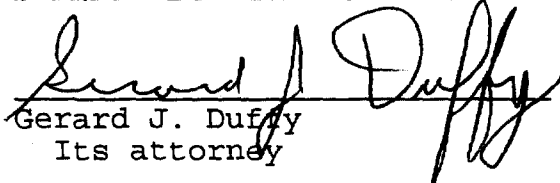
<sup>1</sup> The term "2-PIC" means "two presubscribed interexchange carriers," and allows customers to presubscribe to a telecommunications carrier for all interLATA toll calls, and to presubscribe to another telecommunications carrier (including, but not limited to, the customer's local exchange carrier) for all intraLATA toll calls.

complies with both federal and PUC dialing parity requirements.

In light of the switch upgrades it needs to complete and of the present status and prospective scheduling of the PUC proceedings, Sidney believes that it can complete its conversion to full 2-PIC status within calendar year 1998.

Respectfully submitted,

**SIDNEY TELEPHONE COMPANY**

  
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August 7, 1997

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